

# Data protection

Additional information

## Who is the data controller responsible for your data?

UNIÓN DE CRÉDITOS INMOBILIARIOS S.A. ESTABLECIMIENTO FINANCIERO DE CRÉDITO (hereinafter, “UCI”).

Calle Ombú, 3,(Torre Ombú), 28045 Madrid  
Data Protection Officer Contact: [dpo@uci.com](mailto:dpo@uci.com)

## Why and for what do we process your personal data?

The various purposes of processing by UCI are explained below:

### A. Processing based on the contract or for the adoption of contractual measures requested by the data subject

Depending on the specific request submitted, UCI will proceed with the following processing as needed (1) to adopt the contractual measures requested, or (2) to formalise, execute and develop the corresponding contract pursuant to the following:

- **Initial contact.** Upon your first communication with us, we will process your name and the telephone number or email address you have provided us with, to manage your requests and to provide you with information about our products and services, and to know your assessment of them. We will not save or use them for any other purpose.
- **Financing simulation and preliminary feasibility study.** After that, if you ask us to, we will process your data, in addition, to offer you a financing simulation and conduct a preliminary feasibility study. To do so, we will only use the data you provide on the corresponding form.
- **Formal application for financing.** Thirdly, we will process your personal data to study the application for financing which, as applicable, you submit formally. To do so, we will process the data you provide for this purpose and will also seek information from open sources such as official journals and bulletins, public registers, decisions from the public administrations and official fraud prevention lists.

Likewise, and as necessary, we will check your data with companies that provide information on solvency, payment default and, in general, risk indicators. In particular, and in order to evaluate your risk profile, we will check your data in credit information files such as the National Association of Financial Institutions (“ASNEF”), EXPERIAN and the Bank of Spain Risk Information Centre (CIRBE) as well as the Spanish General Social Security Treasury (Vedacom).

The processing of these data is needed to manage, analyse and evaluate your application for financing with the application of precontractual measures. It is for this reason that you

need to provide all the data requested on the form.

• **Formalisation and performance of the contract.** After that and as a final procedure, we will process your data to proceed with the contract requested and undertake the necessary actions to manage the contractual relationship with you. The data are needed to sign the contract and execute, perform and implement it.

## **B. Processing based on your consent**

Whenever you have granted your consent, UCI may do the following:

- 1.** UCI may send you commercial communications, and assessment surveys, on its own products and services, adapted to your profile, interests and needs (via regular mail, telephone or fax, SMS, instant messaging applications, social networks, email or any other electronic or remote medium available at any given time), which will be personalised based on profiles of your behaviour and risk which may be produced through its own internal or third-party sources (such as ASNEF or Experian, for example, or other UCI Group entities), browsing and/or Internet data. If you have authorised us, these marketing actions may be carried out independently and irrespective of the result of any contacts we maintain, simulations offered or even any contracts for our products.
- 2.** These commercial communications may also be sent by UCI for products and services offered by other UCI Group companies or third-party entities with which it may sign collaboration agreements. The provisions of the foregoing sections 1 and 2 depends on what you authorise and considering your authorisation may be withdrawn at any time without such affecting any simulation or preliminary feasibility study we shall offer you
- 3.** In order to evaluate your risk profile, we will check your data in the Social Security VEDACON file. This depends on whether you grant us authorisation to do so in the understanding that you have the right to deny such processing.
- 4.** We will disclose your data to UCI Group companies as indicated further below as well as to third-party companies with which UCI may sign collaboration agreements within the financial and real estate sectors or related sectors so they may send you general and personalised marketing actions in relation to their products and services. These marketing actions may be through any physical or electronic medium (email, fax, SMS, social networks, mobile applications, etc.). If you grant us your authorisation, you may withdraw it whenever you deem appropriate without affecting the conditions of this contract for any other processing for which the legitimisation does not strictly require your consent.

## C. Processing due to a legitimate interest

Given the legitimate interest of UCI, it will engage in the following types of processing:

**1.** If you submit a formal application for financing to us or contract a loan or other product, your data will be processed and disclosed to the companies that belong to the UCI Group to prevent, investigate and/or discover possible fraud situations as well as the risk corresponding to the transaction or the customer as well as, when necessary, to create a recovery strategy based on a behavioural analysis. The legitimate interest of UCI is to identify and, as applicable, prevent possible fraudulent situations or actions by crossing the information that exists in both companies' databases.

In the same cases, we hereby inform you that situations may occur throughout the contractual relationship you maintain with UCI where we may record your voice during telephone calls and/or your image during videocalls. In such situations –which you will be previously and expressly informed of when they occur- we shall save the telephone and/or videocall conversations held with you for two purposes: to maintain the quality of the service as well as to use any recordings as proof -in and out of court-, as necessary.

If necessary, we will also pseudonymise and encrypt your personal data as concerns the information in our systems and will disclose your data to UCI Group companies for internal administrative procedures and for internal reports and communications.

**2.** Yes, if, in the end, you sign a financing contract, UCI may send you commercial communications on its own products and services similar to those you have already contracted, adapted to your profile, interests and needs (via regular mail, telephone or fax, SMS, instant messaging applications, social networks, email or any other electronic or remote medium available at any given time), produce commercial reports, statistics, surveys and market studies, include you in loyalty programmes and draws and even send detailed information on such programmes and draws as well as their results. UCI shall undertake the foregoing as long as you continue to be our customer and maintain the financing subject of this contract unless you indicate otherwise by contesting the processing in the manner indicated under the section entitled

For the purposes of personalising said commercial communications and based on the legitimate interest recognised by the European General Data Protection Regulation, UCI will process the information from its own sources to create profiles generated pursuant to common behavioural patterns.

**3. Likewise, if you finally contract financing with UCI,** we will process your data to launch and monitor marketing actions with our customer portfolio such as the Customer Club, cross selling (the selling of complementary products) and information campaigns.

Moreover, and as necessary, we will conduct actions to analyse, verify, study and manage incidents and non-payment situations such as but not limited to the contracting of location services in the event of non-payment as well as possible out-of-court settlements and other legal actions.

## **D. Processing to comply with a legal obligation**

1. In general, we shall process your data to comply with legal and fiscal obligations applicable to us pursuant to the laws in effect at any given time.

2. If you submit a formal application for financing to us and/or if you finally decide to contract such financing with us, we will process your data to analyse, monitor and assess the risk you maintain with UCI or the risk of any application you may submit in the future.

Moreover, we also hereby inform you that we will process your data in situations where UCI must comply with certain legal bank supervision and control obligations imposed by Spanish Law 10/2010, on Money Laundering Prevention and Spanish Law 10/2014, on the Organisation, Supervision and Solvency of Credit Institutions. Therefore, your data and any possible non-payment situations will be disclosed to CIRBE (Bank of Spain Risk Information Centre).

This obligation will even exist once the contractual relationship ends, as necessary.

## **What third parties are affected by the processing explained in this document?**

Besides the contract holder, the following intervening parties will be affected by the formalisation of a financing contract:

1. Data processing to manage and/or perform the contract due to a legitimate interest and/or legal obligation:

- Guarantors: in all cases, except for marketing actions due to a legitimate interest.
- Authorised parties: except for marketing actions due to a legitimate interest.
- Representatives: except for marketing actions due to a legitimate interest.

2. For data processing by consent, it depends on what each intervening party consents to:

- Guarantors.
- Authorised parties.
- Representatives.

## **How long will we save your data?**

We will process your personal data as long as they are necessary for the purpose for which you provided us with them. To this end, and as requested in each case, we will save your data:

- As long as they are needed to contact you, offer you the financing simulation you have requested from us and conduct a preliminary feasibility study. Or, if requested from us formally, as long as they are needed to manage, study and evaluate your application.
- If, in the end, you contract with UCI, we will save your data as long as the contract signed with you remains in force and, in any case, until you have made full payment. Moreover, if you contract a loan, we will save your data for 20 years after termination of the contract or payment of the loan, pursuant to the prescription period established by current law as well as to comply with all our fiscal and legal obligations.
- If you have given us your authorisation to send you commercial communications, for the period of time we continue to have such authorisation and until you revoke it.
- Likewise, and after all of the above, for an additional period of 3 years to respond to our liability for the processing done, pursuant to the prescription period established by current data protection law.

Thus, once all your contractual relationships with UCI end, any of the following two situations may apply:

1. You maintain your consent for marketing actions: in such case, we will process your data for the authorised marketing actions.
2. You revoke your consent for marketing actions: in such case, we will cancel and stop processing your data as well as block them.

If you do not expressly inform us otherwise, we shall understand you maintain your consent for marketing actions and will proceed in line with section 1 above. On the contrary, if you inform us of your revocation, the resulting block implies that UCI will not have access to your data and will only save them so they are available to the competent public administrations, judges and courts or the public prosecutor's office to respond to possible liability situations for the legally established periods. They will be deleted once those periods have ended.

## Should you keep your data updated?

Upon signing a contract with us, you undertake to ensure all data you provide to us and found in our databases at any given time are correct, complete, exact and duly updated.

Moreover, if the data you have communicated to us change, especially your mailing address,

email address or telephone numbers (fixed and mobile), you must immediately notify us at any of the addresses (regular mail or email) provided for the purpose of exercising your rights.

Otherwise, you agree that any communications we maintain with your mailing or email address or telephone numbers listed in UCI files shall be considered valid, binding and fully effective if you do not duly inform us of any changes.

## To which recipients do we disclose your data?

We disclose your personal data to:

1. UCI Group companies and associates, for the purposes of developing marketing actions for general and personalised products and services and to comply with legal obligations and management and administrative procedures:
  - UCI S.A.,
  - Retama Real Estate, S.A.,
  - Banco Santander, S.A.,
  - Santander Consumer, S.A.,
  - Santander de Titulización, S.G.F.T., S.A.,
  - Santander Seguros y Reaseguros,
  - BNP Paribas España,
  - BNP Paribas Francia
  - BNP Paribas Personal Finance
2. Public Entities, Tax Agency, General Social Security Treasury, Police, Tax Administration, Spanish Data Protection Agency, courts and tribunals and, in general, any competent authority when UCI is legally required to disclose them.
3. Insurance companies if the data subject contracts insurance products with UCI insurance brokerage services, such as:
  - Liberty Seguros, Compañía de Seguros y Reaseguros S.A,
  - Cardif Assurances Risques Divers y Cardif Assurance VIE (Sucursales en España)
  - CNP Partners, S.A.
4. The Bank of Spain Risk Information Centre (CIRBE), by legal obligation, and credit information files such as the National Association of Financial Institutions (ASNEF) or EXPERIAN, in the event of non-payment, if you do decide to contract UCI financing.
5. Financial, real estate and insurance sector companies with which UCI may sign collaboration agreements so they may send you commercial communications on their products and services, if you have given us your authorisation.
6. In addition to the foregoing data disclosure situations, UCI will collaborate with third-

party service providers who may need to access your personal data and will process said data in the name and on behalf of UCI as a result of their service provision.

UCI follows strict service provider selection criteria in order to comply with its data protection obligations and hereby undertakes to sign the corresponding data processing contract with them which imposes the following obligations, among others: to apply appropriate technical and organisational measures; to process personal data for the purposes agreed and only in accordance with documented UCI instructions; and to erase or return the data to UCI once the service provision has finished.

Specifically, UCI will contract the provision of services by third-party providers who operate in the following sectors: logistics services, legal advising, private appraisal services, supplier approval, multidisciplinary professional service firms, maintenance companies, technology service providers, IT service providers, physical security companies, instant messaging service providers, infrastructure maintenance and management companies and call centre service companies.

## What are your rights when you provide us with your personal data?

- You have the right to confirm whether UCI is processing personal data concerning you or not and, in such case, to access your personal data as well as request the rectification of inaccurate data or, as applicable, request their erasure when the data are no longer necessary for the purposes for which they were collected, among other reasons. These rights may be exercised by writing to: [privacidad@uci.com](mailto:privacidad@uci.com), or to Apartado de Correos 1160 28080 – Madrid. You may also submit the form established for this purpose, which can be requested at any of our offices. For the situations legally provided for, you may request restricted processing of your data by writing to: [privacidad@uci.com](mailto:privacidad@uci.com), or Apartado de Correos 1160, 28080 – Madrid, in which case we will only save them to file or defend ourselves from complaints.
- If you have authorised profiling and it is fully done using an automatic procedure, you may request non-automatic processing, express your opinion and contest decisions based on such profiling by writing to: [privacidad@uci.com](mailto:privacidad@uci.com), or Apartado de Correos 1160, 28080 – Madrid.
- In certain circumstances and for grounds relating to your own individual situation, you may contest the processing of your data by writing to [privacidad@uci.com](mailto:privacidad@uci.com), or Apartado de Correos 1160, 28080 – Madrid. In such case, UCI will stop processing your data except for legitimate reasons or to file or defend itself from complaints.
- The data subject may request the portability of their data so they are directly sent to the entity designated by the data subject.
- The data subject may from here on and at any time withdraw the consent granted for processing by writing to [privacidad@uci.com](mailto:privacidad@uci.com), or Apartado de Correos 1160, 28080 – Madrid.



## Where can you file complaints?

The data subject may contact the UCI Data Protection Officer. A complaint may also be filed with the Spanish Data Protection Agency, especially if the data subject disagrees with the response received from UCI, by writing to: Spanish Data Protection Agency, C/ Jorge Juan, 6, 28001 Madrid, or via the website [www.aepd.es](http://www.aepd.es).